



2019 Annual Green Tier Report

Executive Summary:

Sadoff Iron & Metal Co. was accepted into the Green Tier program in August of 2017. Our vision is to be the Preferred Choice in commodity recycling. Our mission to accomplish this is to incorporate customer focus, attain operational excellence, find innovative solutions, and manage risk. We do this through continuous investments in our people, teamwork and adhering to the standards of excellence.

The foundation of our company is built upon our work within recycling industries, our processes are made up of the buying, collection, processing and sale for ferrous, nonferrous and electronics materials throughout the Midwest and globe. The markets that we participate in allow us to achieve sustainability initiatives for our company as well as being a service to others sustainability efforts, both individual and corporate.

2018/2019 Goal Update:

Our 2017-2018 goals were made up of achieving certification objectives to specific international management system standards. The timeline for achieving our goals had been impacted by the scheduling for our formal audits by our registrar, this delay caused our timeline to extend into the 2019 calendar year. Our company has now achieved certification to the below standards, these certifications will now allow us to compete on a more equal basis as our regional competitors which will provide a greater ability for us to achieve increased recycling rates for electronics items.

- Achieved certification to the ISO 2001:2015
 - *Certification achieved April 2018*
- Achieve certification to the ISO 14001
 - *Certification achieved March 2019*
- Achieve certification to the OSHAS 18001
 - *Certification achieved March 2019*
- Achieve certification to the R2 Standard
 - *Certification achieved March 2019*

Certifications to the ISO 14001, OSHAS 18001 Standards for Environmental, Health and Safety Management and R2 Responsible Recycling Standard will further formalize our beneficial environmental programs that support our business and risk management objectives, provide more robust methods for auditing and drive a focus for continuous improvements.

Program Confirmation and Continuous Improvement Objectives:

2019 is our first certification year for ISO 14001 Environmental Management System. At this time we are pleased to confirm the continuation of our certificate and also to report that we do not have any nonconformance's identified during our most recent audit.

Annually we perform a SWOT to assist in generating an action plan to support our continuous improvement objectives. For the next 12 months we will be implementing the following:

- **Enhanced internal auditing capabilities**
 - We now utilize an electronic internal auditing tool that is capable in supporting our auditing requirements and ISO 14001 internal auditing abilities. This tool allows us to better identify trends and target opportunities for improvement within our operations related to our ongoing and proactive environmental management, this continues to lead us to further our positive overall environmental performance and provide us with a focus for continuous improvements at our facility. Our objective is to continue utilization of this tool and to expand it to areas of our organization that make sense, like our quality and transportation departments.
- **Add robustness to our documentation for our Environmental Management continuation plan.**
 - One of the core functions for any management system is to ensure the smooth continuation for the management requirements and components of the system as a measure for risk management and certification. In 2019 our objective is to continue to build on the robustness of our continuation plans. We are utilizing required components of our ISO 14001 to continuously improve this area, which will serve us beneficially in the event of any unplanned transition in our environmental management.
 - *Areas of Focus for this work:*
 - Reviewing and confirming all our requirements are known and identified to meet our obligations for continuing our environmental compliance
 - Review of our audit schedule for internal and external audits and to ensure proactive utilization.
- **Operational Changes of Note:**
 - Late in 2018 we made a business decision, related to our Oshkosh Facility, to dedicate it completely to the secure collection, processing and sale of Electronics Components and to stop direct purchases of ferrous and nonferrous materials. This decision was based on the poor economic performance of our purchases and handling of FE and NF materials at that facility. Due to this change in scope to our operation we made the decision to also remove our Oshkosh facility from the Wisconsin CCP program as we felt it was no longer needed for the scope of work that we now do at the facility. Overall this change in material that we accept has enhanced our environmental footprint and management at our site. We no longer have environmental interactions that are associated with stormwater contact and the outside storage of bulk ferrous and nonferrous materials.

Compliance Statement:

Sadoff Iron & Metal Company continues to be in compliance with all local, state and federal regulations.

Stakeholder Involvement:

Our certifications to the ISO, OSHAS and R2 management standards will continue to assist us in being transparent with our internal and external stakeholders. This is shown through us meeting the requirements for down-stream auditing, communication, training, development and use of internal process and procedures that incorporate our performance standards into our daily operating activities.

For the purposes of transparency, we maintain a current version of our Integrated Management System Manual and Policy on our website. This can be found at the following link: <https://sadoff.com/about/>

DNR Relationship:

Sadoff Iron & Metal Company had a positive working relationship with the WDNR prior to entering the Green Tier Program. Participation in the Green Tier program has enhanced this relationship. Our company has met with the WDNR annually since 2015.

Conclusion:

Sadoff Iron & Metal values our proactive approach to environmental management. Our “Down to Earth” philosophy is simple – incorporate compliance, proactive management and continuous improvements into our expectations for our daily operations, this results a culture that values our environment and gives our company the ability to generate benefits for our environment as a function of the primary scope of our recycling business.